

ETAD



ETAD North America

Representing the North American Dyes Industry

March 7, 2003

Ms. Gwen DiPietro
Hazardous Waste Identification Division
U.S. Environmental Protection Agency
Washington, D.C.

Re: Docket No. RCRA-2003-0001, Dyes and Pigments Listing Determination

Dear Ms. DiPietro:

At our meeting with EPA on December 5, 2002, ETAD North America presented preliminary documentation describing the changes in the U.S. dye manufacturing industry since 1995 and correcting incorrect information in EPA's table of manufacturing facilities. Following the meeting, ETAD North America contacted the individual companies to obtain definitive information, and the results are presented in this letter. As we indicated in December, many of the facilities formerly manufacturing dyes have either closed or no longer manufacture dyes, and many other facilities on EPA's table are importers, resellers and/or formulators of dyes but are not engaged in dye manufacturing.

The survey confirmed the validity of all of the information in ETAD North America's December 4, 2002 markup of EPA's table entitled "Summary of Onsite Management Units for Companies Manufacturing Dyes," *i.e.*, that there is no on-site landfilling of dye manufacturing waste and that, as of mid-2003, there will be only one dye manufacturing facility with a surface impoundment. The surface impoundment at that single facility, which manufactures only small quantities of four azo dyes, is double-lined and has a leachate collection system. A copy of ETAD North America's earlier submission is attached.

Facilities Manufacturing Dyes

Abbey Color Incorporated
Philadelphia, PA

BASF Corporation
Huntington, WV
[Note: manufactures triarylmethane dyes only.]

Bayer Corporation
Bushy Park Plant
Charleston, SC

Ciba Specialty Chemicals Corporation
St. Gabriel, LA

Clariant Corporation
Martin, SC

Dye Specialties
Jersey City, NJ
[Note: manufactures triarylmethane dyes only.]

Eastman Chemical
Kingsport, TN
[Note: manufacturing reduced to limited quantities for internal uses only.]

Goodrich Corporation (Hilton Davis/Performance Materials)
Cincinnati, OH

Passaic Color and Chemical Co.
Paterson, NJ
[Note: manufactures azo dyes in small quantities.]

Rohm and Haas
Spring House, PA
[Note: manufacturing contracted to a third-party facility that does not have landfills or impoundments.]

Rose Color
Newark, NJ

Sensient Technical Colors
Gibbstown, PA
[Note: facility to close in mid-2003.]

Sensient Technical Colors
St. Louis, MO

Synalloy Corporation/Blackman Uhler Chemical
Spartanburg, SC
[Note: virtually phased out dye manufacturing except for only very small quantities of four azo dyes.]

United Color Manufacturing Inc.
Newtown, PA
[Note: manufacturing contracted to a third-party facility that does not have landfills or impoundments.]

Yorkshire Americas
Lowell, NC

Facilities Not Manufacturing Dyes

Aakash Chemicals and Dyestuffs Incorporated

Glendale Heights, IL

Artistic Chemical Products

Brooklyn, NY

BASF Corporation

Rensselaer, NY

[Note: facility closed.]

Burlington Chemical Company

Burlington, NC

Carey Industries

Danbury, CT

Catawba-Charlab Incorporated (owned by and now known as **CHT**

R. Beitlich Corporation, Bezema Division)

Charlotte, NC

Chemical Compounds, Inc.

Newark, NJ

[Note: manufactures FD&C colorants only.]

Clariant Corporation

Charlotte, NC

[Note: facility ceased dye manufacturing.]

Clariant Corporation

Coventry, RI

[Note: facility ceased dye manufacturing.]

Colors for Plastics, Inc.

Elk Grove Village, IL

Coté Color Corporation

Spartanburg, SC

Fabricolor

Paterson, NJ

[Note: facility closed.]

Global Colors, Incorporated

Glendale Heights, IL

Grant Industries, Incorporated

Elmwood Park, NJ

Isochem Colors, Incorporated
Rock Hill, SC

Keystone Color Works
York, PA

Magruder Color Company
Elizabeth, NJ

Milliken and Company
Blacksburg, SC
[Note: manufactures polymeric colorants only, not subject to proposed listing.]

Milliken and Company
Inman, SC
[Note: manufactures polymeric colorants only, not subject to proposed listing.]

Organic Dyestuffs Corporation
East Providence, RI

Pfister Chemical
Ridgefield, NJ
[Note: facility closed.]

Rohm and Haas
Paterson, NJ
[Note: facility closed.]

Sensient Technical Colors/Crompton & Knowles
Nutley, NJ
[Note: facility closed.]

Sensient Technical Colors/Crompton & Knowles
Newark, NJ
[Note: facility closed.]

Sensient Technical Colors/Crompton & Knowles
Reading, PA
[Note: facility closed.]

Synalloy Corporation/Blackman Uhler Chemical
Augusta, GA
[Note: facility closed.]

I believe this should clarify the status of the U.S. dye manufacturing industry.
Please contact me directly by phone (202-721-4154) or e-mail (helmet@socma.com) if
you have any questions about this information.

Sincerely,



C. Tucker Helmes, Ph.D.
Executive Director

Attachment